

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

MARK LENZI,)
)
Plaintiff,)
)
v.) No. 1:21-cv-1371 (PTG/IDD)
)
U.S. DEPARTMENT OF STATE and)
ANTONY J. BLINKEN, U.S. Secretary of State,)
)
Defendants.)
)

DEFENDANTS' PARTIAL MOTION TO DISMISS

Defendants, through their undersigned counsel, respectfully move to dismiss the Second Amended Complaint (Dkt. No. 50), in part, pursuant to Federal Rule of Civil Procedure 12(b)(6). The grounds for this motion are contained in the accompanying memorandum of law.

Dated: November 25, 2022

Respectfully submitted,

JESSICA D. ABER
United States Attorney

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

LAUREN A. WETZLER
Chief, Civil Division

CARLOTTA P. WELLS
Assistant Branch Director

/s/

MATTHEW J. MEZGER
Assistant United States Attorney
Office of the United States Attorney
2100 Jamieson Avenue
Alexandria, Virginia 22314
Tel: (703) 299-3741
Fax: (703) 299-3983
Email: Matthew.Mezger@usdoj.gov

CATHERINE M. YANG
JOSEPH E. BORSON
Trial Attorneys
United States Department of Justice
Civil Division, Federal Programs Branch
1100 L Street NW
Washington, DC 20005
Tel: (202) 514-4336/1944
Email: Catherine.M.Yang@usdoj.gov
Joseph.Borson@usdoj.gov

Counsel for Defendants